

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE:

MARK ADAM GRIGGS,

Debtor.

CASE NO. 24-40571-pwb

CHAPTER: 13

JUDGE: HPAUL W. BONAPFEL

OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE

COMES NOW Lakeview Loan Servicing, LLC, (hereinafter known as "Creditor"), a secured creditor holding a Security Deed on real property commonly known as 2408 Holly Creek Cool Spr Rd, Chatsworth, GA 30705, and for the reasons stated below, objects to confirmation of the Plan and moves to dismiss this case, as follows:

1. On June 17, 2024, Creditor filed a pre-petition arrearage claim in the approximate amount of \$2,449.19 (See Claim No. 10). The plan lists a pre-petition arrearage amount of \$0.00. Debtor has underestimated the amount of the arrearage due to the Creditor, and for this reason, Creditor objects.

2. Creditor reserves the right to raise the failure of Debtor to have made post-petition payments, if at confirmation that appears to be the case.

WHEREFORE, Creditor prays that the Court deny confirmation of the Plan and moves to dismiss this case. Creditor prays for reasonable attorney's fees and for such other and further relief as is just and equitable.

/s/ Evan Durkovic

Evan Durkovic, Bar No.: 948332

Attorney for Creditor

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CERTIFICATE OF SERVICE

This is to certify that on this day I electronically filed the foregoing **OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE** using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Dan Saeger

K. Edward Safir

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties set forth below at the address shown for each.

Mark Adam Griggs
2408 Holly Creek Cool Springs Rd
Chatsworth, GA 30705

**I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.**

Dated: July 1, 2024

/s/ Evan Durkovic
Evan Durkovic, Bar No.: 948332
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